



**Quality Plan for the
DIVISION OF RECREATION AND PARKS
(FLORIDA PARK SERVICE)**

Florida Department of Environmental Protection

Updated
March 14, 2023

Signature Page

The undersigned have read and understood this Quality Plan, are charged with managing, and improving the quality system, and are responsible for ensuring that all staff properly execute the procedures discussed in the plan.

Chuck Hatcher

Chuck Hatcher, Division Director

3/27/2023

Date

Wes Howell

Wes Howell, Chief
Bureau of Natural and Cultural Resources

3/27/2023

Date

Gregg Walker

Gregg Walker, DRP Quality Assurance Officer
Bureau of Natural and Cultural Resources

3/27/2023

Date

Introduction

The DEP Quality Assurance (QA) program involves the implementation of a management system (planning, review, training, and assessment) to ensure that data collection, generation, interpretation, reporting, evaluation, and archiving are of sufficient quality to support Department decisions. The effectiveness of the Division of Recreation and Parks (DRP) QA program is dependent upon the actions of all DRP staff, from “front line” employees to management, meaning QA is a function distributed throughout the organization. One aspect of DRP’s program is to ensure that Department QA activities are carried out according to commitments made to the Environmental Protection Agency as enumerated in the DEP Quality Management Plan (QMP) (Revised 2020).

The DEP Secretary is committed to implementation of the quality assurance requirements in the QMP and as authorized at Section 403.0623, F.S., and Chapter 62-160, F.A.C. (the DEP QA Rule). It is the Secretary’s intent to carry out these obligations and requirements as described in the Department’s [QA Policy 972](#) (2020).

The Division of Recreation and Parks (DRP) manages the Florida Park Service, which is a land management agency administering 164 state parks and 11 state trails and greenways on about 813,205 acres (as of July 2022 Jurisdiction Report). State Park management includes the planning, design, construction, and repair of modern facilities; the restoration and conservation of 74 different native Florida biological community types in multiple locations; preservation of hundreds of historical structures and archaeological sites; and the administration of visitor services and interpretive programming for 29 million state park visitors annually (2021). Information about the Division and the programs within can be found [here](#).

Land stewardship involves the collection and management of a great variety of information. However, it is important to note that DRP is not a regulatory agency. Rather, DRP is an entity that is regulated by others and is subject to the QA programs of those legislatively mandated regulators including other Divisions of DEP.

Data collection within the Division can be grouped into four separate categories, each with differing QA needs. Each will be described in the Organization and Responsibilities section and are listed here:

1. Water quality sampling including
 - a. drinking water, bathing areas, wastewater, and environmental
 - b. Managing water quality sampling and testing contractors
2. Data collection regulated by outside agencies including
 - a. Imperiled species monitoring (Florida Fish and Wildlife Commission (FWC) & US Fish and Wildlife Service (USFWS))
 - b. Other permit requirements (Local, State and Federal permitting)
3. Programmatic data collection projects
 - a. NRTS database (land management data)

- b. Other Division-supported databases and apps
- 4. Site-specific data collection events

Basic Elements of the DRP Quality Plan

The DRP Quality Plan explains both the process and criteria by which the quality system is managed. The plan is utilized as an instrument of internal communication to inform staff of current and future quality assurance activities. It discusses how specific QA duties are assigned to responsible staff. DRP will revise the Quality Plan as needed and will ensure the consistent application of procedures and criteria for the generation or use of data subject to this plan. The Quality Plan may also be used as a training document for applicable new staff and as a reference for experienced personnel. The plan and its revisions also serve as an archival record of DRP's formal quality system.

The elements of the DRP plan are consistent with the Department's Quality Management Plan, Quality Assurance [Policy 972](#), Rule ([Chapter 62-160, F.A.C.](#)) and Statute ([Sec. 403.0623, F.S.](#)). DRP expects all staff and volunteers involved in the data collection falling within the scope of the Quality System to read, understand and follow the procedures and criteria as discussed in this plan, and to carry out their assigned responsibilities for effective utilization of the quality system.

Policy Statement

It is the Division of Recreation and Parks' policy to:

- Ensure that water quality data used to demonstrate compliance with public use regulations (drinking water and swimming beach standards) are collected according to County Health Department protocols, which themselves are designed to comply with DEP and Department Of Health (DOH) QA standards.
- Ensure that contractors have an approved QA plan when performing applicable tasks on behalf of the Division.
- Ensure that performance-based septic systems and aerobic treatment units (ATUs) are tested in compliance with DEP and DOH QA standards.
- Ensure that ecological data for imperiled species monitoring to be sent to multi-agency databases are collected according established protocols when they exist.
- Adaptively manage the DRP Quality Plan to be consistent with provisions of the DEP Quality Assurance Management Plan.
- Ensure that each staff or volunteer who participates in programmatic data collection is properly trained to execute their assigned functions.
- Ensure that programmatic data is reviewed at multiple levels to ensure the best data feasible.

Ethics

All employees of the DEP Division of Recreation and Parks are held to high professional ethical standards in the performance of their duties. All employees are required to read and understand DEP Directive 202 “Code of Ethics”, attesting to their commitment to honesty and integrity in performance of their duties. In addition, all employees are required to attend an annual ethics training class. Improper, unethical or illegal actions will be dealt with according to the published Administrative Directives of the Florida Department of Environmental Protection.

Organization and Responsibilities

The DRP Quality Assurance System resides within the Division of Recreation and Parks’ Bureau of Natural and Cultural Resources (BNCR) and is partially delegated to the five (5) District Offices around the state. The State Park District Offices provide direction to thirty-odd individual state parks within each of the District boundaries. There are two distinct chains of command within each district. Operational data collection (e.g., wastewater and drinking water sampling) is managed from park staff and volunteers through the park managers to the Assistant District Bureau Chief. Environmental sampling (e.g., springs water quality, vegetation monitoring, etc.) is overseen by the District Lead Biologist (Environmental Scientist III) who reports directly to the District Bureau Chief. Each District Bureau Chief functions as the respective District quality assurance lead.

The function of BNCR is to provide consistent direction and leadership across the Division in the scientific and technical aspects of land management. Within BNCR, the Natural Resources Data Manager (Government Operations Consultant II) is responsible for monitoring environmental data submitted to Division databases and checks for outlying data points as well as monitoring the database functionality. DRP’s Quality Assurance Officer (QAO), Gregg Walker, coordinates and participates in the quality evaluation of program data, and provides oversight to ensure that BNCR staff perform their QA functions. Furthermore, BNCR’s GIS Section Lead provides additional technical support on database management support. The QAO will ensure that QA meetings are held with District QA Leads and the Data Manager on a semi-annual basis.

Responsibility is delegated to District Office staff in two categories. 1) Water quality sampling/testing/training and performance-based septic system oversight and 2) regional ecological data oversight. Each of these are overseen by the District QA Lead.

The QAO also ensures that corrective actions are implemented for data collection that is inconsistent with established protocols. Additionally, the QAO assists program managers in the development of the Quality System and other logistical aspects of its implementation, such as coordinating associated training needs.

DRP staff routinely carry out the following duties involving water quality sampling, water quality testing, and certain resource management data collection:

Water Quality Sampling

In most cases, local county health departments (CHDs) collect and test water samples from state park swimming beaches and potable water wells; however, in some cases, DRP staff collect the water samples and deliver them to the CHD or private labs for testing. Sampling protocols and equipment are provided to staff by the CHD or the private lab. In some cases, chain-of-custody records for samples are maintained by the lab. All sampling information and results must be on the proper forms with time, date, and collector information completed. When DRP uses purchase requisitions to contract these services through MyFloridaMarketPlace, the DEP purchasing section automatically includes a QA template provided by DEP's Division of Environmental Assessment and Restoration (DEAR). Private labs are subject to CHD, DEP or DOH QA oversight. The District QA Lead will maintain a list of all water quality sampling work conducted by contractors. A few parks have swimming pools that are open to the public. The parks are required by law to have a certified pool operator on the premises each day that the pool is in operation. All tests performed are by the pool operator, following guidelines set by the CHD.

Individual parks with potable water wells use staff or contractors to collect and analyze chlorine levels using over-the-counter commercial testing kits. Logs are maintained in the well pump-house, and other procedures are followed, as specified in the wells' onsite Operations and Maintenance Manual, all of which is regulated by the CHD and compliant with 62-604, F.A.C. When appropriate, water quality sampling, at a minimum, will follow the established [DEP Standard Operating Procedures](#). DRP does not maintain any additional internal written procedures, but follows DEP, DOH, and NELAP (National Environmental Laboratory Accreditation Program) guidelines and standards.

Individual parks with wastewater treatment plants, performance-based septic systems, or ATUs contract testing of septic water to comply with permits from DEP, which are written to the QA requirements adopted by DEP or DOH. Each District QA Lead will maintain a list of parks that are operating wastewater treatment plants.

Ecological Data Collection Regulated by Outside Agencies

Ecological data for imperiled species monitoring that subsequently will be sent to external agency databases are collected on Division-managed lands by staff and volunteers according to protocols written by the coordinating entity (e.g., Florida Fish and Wildlife Conservation Commission (FWC) for marine turtles). Other examples include scrub jay monitoring, gopher tortoise monitoring and beach mice monitoring. At the time of writing, FWC includes 59 animal species within the [Imperiled Species Management Plan; 2016-2026](#), not all of which have established/approved monitoring

protocols. All training for imperiled species monitoring is conducted by the appropriate coordinating agency and their partners.

Many of these data collection efforts follow protocols established by other agencies or entities and approved by DEP or CHD. If corrective actions are needed, they will be directed by the District QA Leads to address irregularities in data collection.

Programmatic Data Collection

In 2012, DRP developed the Natural Resources Tracking System (NRTS) Oracle database to manage and store data on prescribed fire and invasive plant management. Although prescribed fire data had been collected previously in an MS Access database, developing NRTS was the first attempt at a division-wide system to manage resource management data. NRTS is a collective effort between DRP, OTIS and contractors. Improvements to NRTS occur frequently. The NRTS User's Guide is currently being updated as the methods for measuring invasive plants is being updated through a partnership with the Florida Natural Areas Inventory (FNAI), a research branch of Florida State University. These updates are expected to be completed and implemented by December 2023.

In 2019, the Division began test-implementing data-collection apps for some imperiled species monitoring. Currently, the only operating app is the Sea Turtle Nesting Survey app. The Sea Turtle app collects data uniformly across multiple parks and the resulting data is managed by BNCR and submitted to FWC. FWC is responsible for establishing the [sampling protocol and training requirements](#) and is the primary end-user of the data. Data is being reviewed at multiple levels (park, district, BNCR, and FWC) and corrected as needed.

Additional programmatic apps are being considered but current staff workloads restrict how many apps can be developed and managed. If and when future apps are developed, the QA process for data will include the appropriate review at the District level and spot-checking within BNCR.

Site-Specific Data Collection

Other kinds of ecological data collected by trained DRP biologists and other resource management staff have sufficient quality assurance for the purpose of the individual project, but these events are too diverse and task-specific to be logically included within the DRP QA Plan. These data collection efforts support decision-making for site-specific adaptive management in the restoration and protection of natural habitats and non-imperiled species. These data are generally not submitted to BNCR or DEP. For these efforts, staff utilize their professional education and peer-reviewed, published monitoring protocols and standards. An example would be the "Aims and Methods of Vegetation Ecology" by Dieter Mueller-Dombois and Heinz Ellenberg published in 1974 and updated in 2002 by Blackburn Press (Caldwell, New Jersey).

Training

All personnel are properly trained to perform their duties. Supervisors periodically assess whether DRP's staff performance conforms to the policies and procedures of DRP. DRP's training procedures consist of:

- Training for specific QA functions
 - For water quality testing (beaches and potable water wells), field instruction and written protocols are provided by local CHDs at their discretion and reinforced at the time of annual inspections. Additional training by DRP is prescribed as determined by the district QA Leads in special circumstances. Furthermore, the Aquatic Ecology and Quality Assurance Section (AEQAS) provides a multitude of in-person and online training opportunities located [here](#). Finally, AEQAS staff are available for QA related questions.
 - The MyFloridaMarketPlace (MFMP) procurement system is managed by the Department of Management Services (DMS) and is overseen within DEP by the Bureau of General Services (BGS). DMS provides nine different in-person and online training opportunities suited to the different roles an MFMP user may have. More information can be found [here](#). DMS sets the required training standards, including refresher training intervals based on the specific role of each user. AEQAS provides specific online training for contracts, grants, and purchase orders related to water sampling and the associated QA requirements. This training can be found [here](#).
 - Water quality testing in wastewater treatment plants is conducted by certified operators pursuant to [62-602 F.A.C.](#) Testing of performance-based septic systems and ATUs is done by contract. Protocols for this testing are currently determined by the DEP and DOH.
 - Specific training materials for routine functions and designated QA activities include:
 - Public use wells are required to have standard operating procedures, including the "Operations and Maintenance Manuals", to guide maintenance and to provide testing protocols. These manuals are inspected for compliance in the annual CHD inspections.
 - Refresher trainings or delivery of updated information.
 - Updates are provided at the discretion of the CHDs, FWC (and their partners) for the various QA activities listed in the DRP plan.
 - For imperiled species monitoring, training materials and field instruction is provided by FWC and their designees. Staff and volunteers participating in these monitoring programs must take the training or otherwise demonstrate sufficient expertise in the monitoring activities. Examples include:
 - Sea turtle monitoring – FWC has established training requirements for the different participant roles. Details can be found [here](#) and within [68E-1.004 F.A.C.](#)

- Gopher tortoise management – permits from FWC are required if tortoises need to be relocated. Details can be found [here](#). Monitoring does not require a permit unless a burrow scope is used.
- Scrub jays – staff and volunteers monitoring scrub jays attend an annual training held by Audubon Florida following the JayWatch protocols found [here](#). Scrub jay banding requires the appropriate permits from FWC and USFWS. Details can be found [here](#).
- Shorebirds – Shorebird monitoring and data submission is managed by FWC and USFWS which requires training conducted by FWC. Details can be found [here](#).
- For programmatic data collection in NRTS, training occurs as needed and is provided by the District biologists. Training needs are a frequent discussion within DRP committees including Invasive Plant Coordinators, Prescribed Fire Coordinators, and the AmeriCorps program. These training needs are then conveyed to the appropriate District biologists. If substantial changes are made to either data collection protocol or data reporting requirements, BNCR provides training either in-person or in a virtual format to provide consistency within the Division.

Water Quality Sampling Design and Procedures

Successful implementation of DRP's program relies on valid data, which begins with proper sampling. Therefore, DRP performs the following activities concerning water quality sampling:

- Well water sampling/testing for chlorine or water sampling from swimming beaches that is assigned to staff (i.e., not contracted out) is done so at the discretion of the park manager, depending on day-to-day operational requirements. The sampling plan and Standard Operating Procedures (SOPs) consist of the instructions and schedule as dictated by the CHD.
- Contracted water sampling SOPs are included in DEP's QA templates attached to purchase orders and contracts.
- DEP has established SOPs for water quality sampling and aquatic biological community sampling and can be found [here](#).

Data Review

DRP has no regulatory role, but rather submits samples and data as required by permits, following the appropriate QA programs adopted by the permitting agencies. This would include water quality sampling activities described above (i.e., water sample collection/transport and chlorine testing) and imperiled species monitoring. For these events, the Data Quality Objectives (DQOs) and Data Quality Indicators (DQIs) are often established by the permitting agency and reported to them as needed. In addition to supporting these regulatory efforts, DQOs are being established to ensure that DRP staff

that are tasked with out-sourcing water sampling review the established contracts, grants and PO training found [here](#) and follow the guidance provided.

For programmatic, non-regulatory environmental data collected and submitted to the Division (e.g., NRTS data), data review and management is an on-going process between BNCR, District biologists, and the field staff collecting the data. The DQO for this data is that the data must be of sufficient quality (and repeatability) to make appropriate land management decisions. For example, vegetation sampling usually includes cover class ranges, in which two observers may provide cover class estimates that are over 20% different but still within the same cover class and therefore, appropriate for data management and decision-making. The NRTS User's Guide, currently under revision, provides guidance to ensure repeatable vegetation sampling. BNCR will provide oversight and consistency for trainings held at the District level.

When non-regulatory data is found to be outside historic norms (e.g., not within two standard deviations), the data reviewers (District biologists and/or BNCR) reach out to the data collector(s) for clarification and confirmation. No formal data review or Data Quality Objectives have been established to date but could be considered in the future. Audits are not conducted for non-regulatory data collection. Training opportunities are provided to the field as requested to maintain uniform data collection.

Documentation

Since accurate documentation is an important factor for determining the success of QA activities, DRP carries out the following record-keeping procedures for the indicated activities to ensure appropriate documentation:

- Sampling
 - Water sampling from beaches and potable water wells are done regularly by or for CHDs and logs at the park are not needed. An exception is the regular chlorine checks conducted by staff, which are logged in according to CHD protocols.
- Data review
 - District QA Lead notifies the BNCR/DQO by email that quarterly data in NRTS has been reviewed.
- Calculation checks
 - NRTS reports and output is reviewed by BNCR staff regularly for accuracy.
- Data archiving
 - Public well chlorine test logs are retained at the park level according to the standard DEP records retention schedule.
- Document control and maintenance
 - The lab results returned to the parks from the CHD are filed in the parks. Ecological monitoring data are scanned and sent from the

parks to the district offices for compilation, then on to DRP's Bureau of Natural and Cultural Resources (BNCR) for statewide compilation, and then on to FWC by hard copy or electronically. Electronic copies are maintained by BNCR. Historic information on marine turtle nesting is maintained on a spreadsheet over the years by BNCR and is used in their annual statewide summary report of resource management activities. Current nesting data is managed by BNCR in a cloud-based database.

- Record generation, retention, and storage procedures
Water quality lab results are kept on file by the parks and are subject to the DEP records retention schedule. Parks and district offices keep imperiled species monitoring results at their discretion for management and interpretive purposes.

Contract Management

DRP District QA Leads ensure that the applicable DEP sampling contracts are properly managed to provide appropriate data quality. As such, DRP conducts the following activities related to appropriate contract development and review:

- **Description of process for review of contracts, work plans, and QA plans for sampling and analysis tasks, etc.**

The contracted water quality data collection and analysis falling under this Quality System is subject to standard DMS finance and purchasing regulations including Administrative Policy ([ADM300](#)) and participation in the MyFloridaMarketPlace (MFMP) procurement system. DEP has established the Quality Assurance Process for Procurement of Sampling and Analytical Services guidelines found [here](#). If sampling or analytical services are included in the contract, QA approval from the AEQAS is required. Prior to routing to AEQAS for a QA review, field staff will ensure that the appropriate QA check box on the Business Needs Analysis, Form No. DEP 55-197 (BNA) is selected. The DQO for contract management is to ensure that all DRP staff involved with relevant sampling contracts review the "[QA Requirements for Contracts, Grants, and Purchase Orders](#)" on an annual basis.

Audits and Corrective Actions

DRP is a permittee, not a permitter, and has no regulatory role. Water quality and imperiled species data that is collected under the DRP Quality System are collected under protocols established by other entities. For example, local County Health Departments (CHD) verify chlorine testing methodology and results at their discretion. The activities described above, i.e., water sample collection/transport and chlorine testing are audited, as needed, by the appropriate agency. For programmatic data collected for submittal to DRP and DEP (e.g., NRTS environmental data), data is

thoroughly reviewed at the District Office and spot checked by BNCR at the appropriate intervals (typically quarterly).

Report Compilation

To provide the Secretary with information regarding DEP's ongoing QA efforts, DRP will describe and compile the results of QA activities associated with water quality sampling and programmatic environmental data collection. This information will be gathered from the parks by the five District Quality Assurance Leads, compiled by the QAO, and passed on to the Aquatic Ecology and Quality Assurance Section (AEQAS) for the DEP Annual Quality Assurance Report to the Secretary.